

EXHIBIT A

Exhibit A – Proposed Constructions and Supporting Intrinsic and Extrinsic Evidence for Disputed Terms

A. Terms That the Parties Agree Are Not Subject to 35 U.S.C. § 112(6)

Claim Term	RevelHMI’s Proposed Construction and Supporting Evidence	Samsung’s Proposed Construction and Supporting Evidence
<p>“vibration module”</p> <p>(’081 and ’830 Patents, claims 1-8, 17)</p>	<p>Plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’081 patent¹ at Abstract, 1:15-20, 1:24-3:3, 3:7-21, 3:25-4:9, 4:13-43, 15:18-34, Figs. 4A-4G, 5A-5B, 6, 7A-7C, 10-18, 24A-24B, 25 and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Defendants’ Petitions and any other filings in IPR2023-00992, IPR2023-00993, and IPR2023-01025.</p> <p><i>Resonant Systems, Inc. v. Sony Group Corp.</i>, United States District Court for the Eastern District of Texas, Marshall Division, Case No. 2:22-CV-00424-JRG, Dkt. No. 107 (“<i>Sony Markman Order</i>”) at 8-9.</p>	<p>“a vibration-generating device that can be incorporated in a wide variety of appliances, devices, and systems to provide vibrational forces”</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’081 patent in its entirety, including, for example: Abstract, 3:7-20, 3:32-35, 3:41-49, 3:61-63, 4:13-17, 4:44-57, 5:66-6:2, 6:43-47, 9:28-30, 9:64-67, 10:13-15, 10:23-25, 10:42-44, 14:17-19.</p> <p>’830 patent in its entirety, including, for example: Abstract, 3:11-25, 3:36-39, 3:45-53, 3:65-67, 4:17-21, 4:49-62, 6:6-9, 6:52-56, 9:39-41, 10:9-12, 10:26-28, 10:35-37, 10:55-57, 14:36-38.</p> <p>October 23, 2017 Response to Office Action (App. No. 15/181,249) at 3-4.</p>

¹ Because the ’081 and ’830 patents share the same specification, all of RevelHMI’s citations are to portions of the ’081 patent unless otherwise specified. Thus, RevelHMI’s citations to the ’081 patent should be understood to encompass the corresponding portions of the ’830 patent.

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	<p>Samsung's IPR petitions challenging the '081 and '830 patents</p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung</p> <p>Declaration of R. Jacob Baker on file in the <i>Sony</i> action.</p>	<p><u>Extrinsic Evidence</u></p> <p>Expert testimony of Dr. Clifton Forlines supporting Samsung's proposed construction, previously served upon RevelHMI (Dkt. 69-5)</p> <p>Wiley Electrical and Electronics Engineering Dictionary, 480 (2004) (SAMRES_00053926-28).</p> <p>Dictionary of Science and Technology, Second Ed., 400 (2007) (SAMRES_00053911-13).</p>
<p>"claim 1"</p> <p>('081 and '830 Patents, claim 4)</p>	<p>Claim 4 of each patent depends from Claim 3 rather than Claim 1.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent at claims 1-6</p> <p><u>Extrinsic Evidence</u></p> <p>Defendants' Petitions and any other filings in IPR2023-00992, IPR2023-00993, and IPR2023-01025.</p> <p><i>Sony</i> Markman Order at 20-25.</p> <p><i>Apple</i> Markman Order at 49-50.</p>	<p>Plain and ordinary meaning</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent in its entirety, including, for example: 6:2-8, 6:24-42, Fig. 6.</p> <p>'830 patent in its entirety, including, for example: 6:9-16, 6:34-51, Fig. 6</p> <p><u>Extrinsic Evidence</u></p> <p>Opening Claim Construction Brief by Apple, Inc (Dkt. 75) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 24-30.</p>

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	<p>Samsung's IPR petitions challenging the '081 and '830 patents</p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung</p> <p>Declaration of R. Jacob Baker on file in the <i>Sony</i> action.</p> <p>Declaration of Keith Goossen on filed in the <i>Apple</i> action.</p>	<p>Responsive Claim Construction Brief by Resonant Systems, Inc. (Dkt. 79) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 22-24.</p> <p>Affidavit in Support of Corrected Declaration of Kristopher R. Davis In Support of Plaintiff's Claim Construction Brief by Resonant Systems, Inc. (Dkt. 80) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077</p> <p>Reply Claim Construction Brief by Apple, Inc. (Dkt. 82) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 12-15.</p> <p>Sur Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 83) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, p. 11.</p> <p>Claim Construction Order (Dkt. 91, 103) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 5-6, 43-47, 48-50, 51-52.</p> <p>Opening Claim Construction Brief by Resonant Systems, Inc. (Dkt. 62) Resonant Systems, Inc.</p>

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		<p>v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 12-15.</p> <p>Responsive Claim Construction Brief by Sony Group Corporation, Sony Interactive Entertainment, Inc (Dkt. 65) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 18-20.</p> <p>Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 67) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 7-8.</p> <p>Claim Construction Order (Dkt. 107) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 20-22.</p> <p>Petition for <i>Inter Partes</i> Review (Paper 1) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 8-9.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 16) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 26-27.</p>

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		<p>Patent Owner's Response (Paper 26) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 17-18.</p> <p>Petitioner's Reply (Paper 37) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 7.</p> <p>Patent Owner's Sur-Reply (Paper 40) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 6.</p> <p>Record of Oral Hearing (Paper 46) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992</p> <p>Final Written Decision (Paper 47) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 43-44.</p> <p>Petition for <i>Inter Partes</i> Review (Paper 3) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 9.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 17) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 10-11.</p>

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		<p>Patent Owner's Response (Paper 28) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 17-18.</p> <p>Petitioner's Reply (Paper 38) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 7.</p> <p>Patent Owner's Sur-Reply (Paper 41) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 6.</p> <p>Record of Oral Hearing (Paper 47) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, IPR2023-00993</p> <p>Final Written Decision (Paper 48) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 17.</p> <p>Expert testimony of Dr. Clifton Forlines supporting Samsung's proposed construction, previously served upon RevelHMI (Dkt. 69-5)</p>
<p>"the one or more operational control outputs"</p> <p>('081 and '830 Patents, claims 4, 5, 6)</p>	<p>Plain and ordinary meaning; not indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p>	<p>Indefinite/no antecedent basis</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p>

Claim Term	RevelHMI's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
	<p>'081 patent at Abstract, claims 1-4, Figs. 6, 7A-7C, 8, 9, 19-21, 22A-22B, 23 and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Samsung's IPR petitions challenging the '081 and '830 patents</p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung</p>	<p>'081 patent in its entirety, including, for example: 6:2-8, 6:24-42, Fig. 6.</p> <p>'830 patent in its entirety, including, for example: 6:9-16, 6:34-51, Fig. 6.</p> <p><u>Extrinsic Evidence</u></p> <p>Petition for <i>Inter Partes</i> Review (Paper 1) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 8-9.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 16) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 26-27.</p> <p>Patent Owner's Response (Paper 26) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 17-18.</p> <p>Petitioner's Reply (Paper 37) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 7.</p> <p>Patent Owner's Sur-Reply (Paper 40) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 6.</p>

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<p>"the received output signals" / "the received output signals from the sensors"</p> <p>('081 and '830 Patents, claim 4)</p>	<p>Plain and ordinary meaning; not indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent at Abstract, claims 1-4, Figs. 6, 7A-7C and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Samsung's IPR petitions challenging the '081 and '830 patents</p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung</p>	<p>Indefinite/no antecedent basis</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent in its entirety, including, for example: 6:2-8, 6:24-42, Fig. 6.</p> <p>'830 patent in its entirety, including, for example: 6:9-16, 6:34-51, Fig. 6.</p> <p><u>Extrinsic Evidence</u></p> <p>Petition for <i>Inter Partes</i> Review (Paper 1) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 8-9.</p>

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<p>“the sensors” / “the one or more sensors”</p> <p>(’081 and ’830 Patents, claim 4)</p>	<p>Plain and ordinary meaning; not indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’081 patent at Abstract, claims 1-4, Figs. 6, 7A-7C and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Defendants’ Petitions and any other filings in IPR2023-00992, IPR2023-00993, and IPR2023-01025.</p> <p><i>Resonant Systems, Inc. v. Apple, Inc.</i>, United States District Court for the Western District of Texas, Midland/Odessa Division, MO:23-CV-00077-ADA, Dkt. 103 (“<i>Apple</i> Markman Order”) at 43-45.</p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI’s proposed construction, served upon Samsung</p> <p>Declaration of Keith Goossen on file in the <i>Apple</i> action.</p>	<p>Indefinite/no antecedent basis</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’081 patent in its entirety, including, for example: 6:2-8, 6:24-42, Fig. 6.</p> <p>’830 patent in its entirety, including, for example: 6:9-16, 6:34-51, Fig. 6.</p> <p><u>Extrinsic Evidence</u></p> <p>Petition for <i>Inter Partes</i> Review (Paper 1) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 8-9.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 16) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 26-27.</p> <p>Patent Owner’s Response (Paper 26) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 17-18.</p> <p>Petitioner’s Reply (Paper 37) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 7.</p>

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<p>"wherein the one or more operational control outputs is a control output that determines a current supplied by the power supply to the driving component and a frequency at which the control component drives the moveable component to [linearly] oscillate"</p> <p>('081 and '830 Patents, claim 6)</p>	<p>Plain and ordinary meaning; not indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent at Abstract, claim 6, 15:18-34, Figs. 5A, 6, 7A-7C, 8, 9, 19-21, 22A-22B, 23 and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Samsung's IPR petitions challenging the '081 and '830 patents</p>	<p>"wherein the one or more operational control outputs is a control output that determines a current supplied by the power supply to the driving component and <u>is</u> a frequency at which the control component drives the moveable component to [linearly] oscillate"</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent in its entirety, including, for example: 6:25-35, 6:47-61, 7:13-18, 8:10-22, Figs. 6, 7A, 7B, 7C.</p>

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	Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung	'830 patent in its entirety, including, for example: 6:34-44, 6:56-7:3, 7:23-29, 8:20-32, Figs. 6, 7A, 7B, 7C. <u>Extrinsic Evidence</u> Expert testimony of Dr. Clifton Forlines supporting Samsung's proposed construction, previously served upon RevelHMI (Dkt. 69-5)

B. Terms That Samsung Contends Are Subject to 35 U.S.C. § 112(6)

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
<p>“driving component that drives the moveable component [in each of two opposite directions/to oscillate] within the housing”</p> <p>(’081 and ’830 Patents, claim 1)</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p><u>Function:</u> driving the moveable component [in each of two opposite directions/to oscillate] within the housing</p> <p><u>Corresponding structures:</u> One or more coils or electromagnets. E.g., ’081 and ’830 Patents, Figs 4A-4G (coil 420); Fig. 5A (coil 514), Fig. 6 (coil 626), electromagnet of Fig. 10, electromagnet of Fig. 11, Fig. 12 (coil 1206), Fig. 13 (first coil 1302 and second coil 1304), Fig. 14 (coils 1412 and 1414), Figs. 15, 16 (coil 1510), stator coils of Figures 24A, 24B, and 25; and equivalents thereof</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p><u>Function:</u> driving the moveable component [in each of two opposite directions/to oscillate] within the housing</p> <p><u>Structure:</u> One or more electromagnetic coils. E.g., ’081 and ’830 Patents, Figs. 4A-4G (coil 420), Fig. 5A (coil 514), Fig. 6 (coil 626), electromagnet of Fig. 10, electromagnet of Fig. 11, Fig. 12 (coil 1206), Fig. 13 (first coil 1302 and second coil 1304), Fig. 14 (coils 1412 and 1414), Figs. 15, 16 (coil 1510), stator coils of Figures 24A, 24B, and 25</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
	<p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent at Abstract, 15:18-34, Figs. 4A-4G, 5A, 6, 10-18, 24A-24B, 25, and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Samsung's IPR petitions challenging the '081 and '830 patents</p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung</p>	<p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent in its entirety, including, for example: 9:39-63, Figs. 4A-G, 5, 6, 13, 15, 16.</p> <p>'830 patent in its entirety, including, for example: 9:50-10:8, Figs. 4A-G, 5, 6, 13, 15, 16.</p> <p><u>Extrinsic Evidence</u></p> <p>Expert testimony of Dr. Clifton Forlines supporting Samsung's proposed construction, previously served upon RevelHMI (Dkt. 69-5)</p>
<p>“control component that controls supply of power from the power supply to the driving component to cause the moveable component to oscillate at a frequency and an amplitude specified by user input received from the user-input features”</p> <p>('081 Patent, claim 1)</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p><u>Function:</u> controlling supply of power from the power supply to the driving component to cause the moveable component to oscillate at a frequency and an amplitude specified by user input received from the user-input features</p> <p><u>Corresponding structures:</u> microcontroller, a processor, a CPU, or a microprocessor where the microcontroller, processor, CPU, or microprocessor are programmed with an algorithm comprising the following steps: (a) set the mode and strength to [default values or]</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p><u>Function:</u> controlling supply of power from the power supply to the driving component to cause the moveable component to oscillate at a frequency and an amplitude specified by user input received from the user-input features</p> <p><u>Structure:</u> a microcontroller, a processor, a microprocessor, or a CPU contained within the vibration module that performs the algorithm shown in Figure 7A excluding steps 718-724, with reference to all steps shown in Figure 7B excluding Step 734, and all steps shown in Figure</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
	<p>values representing selections made by user input to the user input features; and (b) provide a corresponding output to the power supply so that the power supply provides a corresponding output to the driving component and equivalents thereof.</p> <p><i>See, e.g., '081 patent at 7:10-24, 8:10-20, Figs. 7A, 7C</i></p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent at Abstract, 3:45-49, 5:66-8:30, 7:10-24, 8:10-20, 10:53-13:51, 14:60-64, 15:18-34, Figs. 6, 7A-7C, 8, 9, 19-23 and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Defendants' Petitions and any other filings in IPR2023-00992, IPR2023-00993, and IPR2023-01025.</p> <p><i>Sony Markman Order at 9-16.</i></p> <p>Samsung's IPR petitions challenging the '081 and '830 patents</p>	<p>7C, or the algorithm described in the corresponding text. See, e.g., '081 patent at 6:43-7:24, 7:32-7:42, 7:50-8:30, and equivalents thereof.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent in its entirety, including, for example: 5:45-49, 6:2-8, 6:11-12, 6:32-33, 6:43-7:24, 7:32-42, 7:50-8:30, 9:67-10:4, 10:53-11:3, 11:43-58, 11:59-12:3, 12:31-35, 12:36-39, 12:48-51, 13:3-13, 13:34-41, 13:42-50, 14:60-64, Figs. 7A, 7B, 7C.</p> <p>October 23, 2017 Response to Office Action (App. No. 15/181,249) at 3-4.</p> <p><u>Extrinsic Evidence</u></p> <p>Opening Claim Construction Brief by Apple, Inc (Dkt. 75) <i>Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc.</i> WDTX-7-23-cv-00077 at, e.g., pp. 5-22.</p> <p>Responsive Claim Construction Brief by Resonant Systems, Inc. (Dkt. 79) <i>Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc.</i> WDTX-7-23-cv-00077 at, e.g., pp. 2-19.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
	<p>Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung</p> <p>Declaration of R. Jacob Baker on file in the <i>Sony</i> action.</p>	<p>Affidavit in Support of Corrected Declaration of Kristopher R. Davis In Support of Plaintiff's Claim Construction Brief by Resonant Systems, Inc. (Dkt. 80) <i>Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc.</i> WDTX-7-23-cv-00077</p> <p>Reply Claim Construction Brief by Apple, Inc. (Dkt. 82) <i>Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc.</i> WDTX-7-23-cv-00077 at, e.g., pp. 1-9.</p> <p>Sur Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 83) <i>Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc.</i> WDTX-7-23-cv-00077 at, e.g., pp. 1-8.</p> <p>Claim Construction Order (Dkt. 91, 103) <i>Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc.</i> WDTX-7-23-cv-00077 at, e.g., pp. 15-39.</p> <p>Opening Claim Construction Brief by Resonant Systems, Inc. (Dkt. 62) <i>Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al</i> EDTX-2-22-cv-00424 at, e.g., pp. 6-8.</p> <p>Responsive Claim Construction Brief by Sony Group Corporation, Sony Interactive Entertainment, Inc (Dkt. 65) <i>Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al</i> EDTX-2-22-cv-00424 at, e.g., pp. 7-14.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 67) <i>Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al</i> EDTX-2-22-cv-00424 at, e.g., pp. 4-6.</p> <p>Claim Construction Order (Dkt. 107) <i>Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al</i> EDTX-2-22-cv-00424 at, e.g., pp. 9-16.</p> <p>Petition for <i>Inter Partes</i> Review (Paper 1) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 7-8, 18-23.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 16) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 25-27.</p> <p>Patent Owner's Response (Paper 26) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 9-16.</p> <p>Petitioner's Reply (Paper 37) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 5-6.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Patent Owner's Sur-Reply (Paper 40) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 3-5.</p> <p>Record of Oral Hearing (Paper 46) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992</p> <p>Final Written Decision (Paper 47) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 20-21, 26-39, 39-41.</p> <p>Expert testimony of Dr. Clifton Forlines supporting Samsung's proposed construction, previously served upon RevelHMI (Dkt. 69-5)</p>
<p>"control component that controls supply of power from the power supply to the driving component to cause the moveable component to oscillate at a frequency and an amplitude specified by one or more stored values"</p> <p>('830 Patent, claim 1)</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p>Function: controlling supply of power from the power supply to the driving component to cause the moveable component to oscillate at a frequency and an amplitude specified by one or more stored values</p> <p>Corresponding structures: a microcontroller, a processor, a CPU, or a microprocessor contained within the vibrating module where the microcontroller, processor, CPU, or microprocessor are programmed with an algorithm comprising the following steps: (a) set</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p>Function: controlling supply of power from the power supply to the driving component to cause the moveable component to oscillate at a frequency and an amplitude specified by one or more stored values</p> <p>Structure: a microcontroller, a processor, a microprocessor, or a CPU contained within the vibration module that performs the algorithm shown in Figure 7A excluding steps 710-712, and 718-724, with reference to all steps shown in Figure 7C, or the algorithm described in the</p>

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	<p>the mode and strength to [default values or] values representing selections made by user input to the user input features; and (b) provide a corresponding output to the power supply so that the power supply provides a corresponding output to the driving component and equivalents thereof.</p> <p><i>See, e.g.</i>, '830 patent at 7:20-34, 8:20-30, Figs. 7A, 7C</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'830 patent at Abstract, 7:20-34, 8:20-30, 15:18-34, Figs. 6, 7A-7C, 8, 9, 19-23 and specification text corresponding to those Figures; <i>see also</i> '081 patent at Abstract, 3:55-49, 5:66-8:30, 7:10-24, 8:10-20, 10:53-13:51, 14:60-64, 15:18-34, Figs. 6, 7A-7C, 8, 9, 19-23 and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Samsung's IPR petitions challenging the '081 and '830 patents</p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung</p>	<p>corresponding text. <i>See, e.g.</i>, '830 patent at 6:52-7:29, 7:31-7:34, 8:20-8:40, and equivalents thereof.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'830 patent in its entirety, including, for example: 5:52-56, 6:9-16, 6:19-20, 6:40-41, 6:52-7:29, 7:31-34, 8:20-40, 10:12-16, 10:66-11:16 11:57-12:5, 12:6-18, 12:46-50, 12:51-54, 12:63-67, 13:20-31, 13:52-59, 13:60-14:1, 15:14-17, Figs. 7A, 7C.</p> <p>October 23, 2017 Response to Office Action (App. No. 15/181,249).</p> <p><u>Extrinsic Evidence</u></p> <p>Opening Claim Construction Brief by Apple, Inc (Dkt. 75) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 5-22.</p> <p>Responsive Claim Construction Brief by Resonant Systems, Inc. (Dkt. 79) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 2-19.</p> <p>Affidavit in Support of Corrected Declaration of Kristopher R. Davis In Support of Plaintiff's</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Claim Construction Brief by Resonant Systems, Inc. (Dkt. 80) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077</p> <p>Reply Claim Construction Brief by Apple, Inc. (Dkt. 82) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 1-9.</p> <p>Sur Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 83) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 1-8.</p> <p>Claim Construction Order (Dkt. 91, 103) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 15-39.</p> <p>Opening Claim Construction Brief by Resonant Systems, Inc. (Dkt. 62) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 6-8.</p> <p>Responsive Claim Construction Brief by Sony Group Corporation, Sony Interactive Entertainment, Inc (Dkt. 65) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 7-14.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 67) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 4-6.</p> <p>Claim Construction Order (Dkt. 107) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 9-16.</p> <p>Petition for <i>Inter Partes</i> Review (Paper 3) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, <i>e.g.</i>, 7-8, 18-23.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 17) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993.</p> <p>Patent Owner's Response (Paper 28) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, <i>e.g.</i>, 9-16.</p> <p>Petitioner's Reply (Paper 38) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, <i>e.g.</i>, 5-7.</p> <p>Patent Owner's Sur-Reply (Paper 41) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, <i>e.g.</i>, 3-5.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Record of Oral Hearing (Paper 47) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, IPR2023-00993</p> <p>Final Written Decision (Paper 48) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 10-14.</p> <p>Expert testimony of Dr. Clifton Forlines supporting Samsung's proposed construction, previously served upon RevelHMI (Dkt. 69-5)</p>
<p>"wherein the control component receives output signals from sensors within the [linear] vibration module during operation of the [linear] vibration module and adjusts one or more operational control outputs of the control component according to the received output signals from the sensors"</p> <p>('081 and '830 Patents, claim 3)</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p>Function: receiving output signals from sensors within the [linear] vibration module during operation of the [linear] vibration module and adjust one or more operational control outputs of the control component according to the received output signals from the sensors</p> <p>Corresponding structures: microprocessor or microcontroller 602; processor or CPU (<i>see, e.g.</i>, Fig. 7A steps 706, 708 and/or Fig. 7B steps 730, 736-754 and/or Fig. 7C Step 762); and equivalents thereof.</p> <p><i>See, e.g.</i>, '081 patent at 7:13-18, 7:32-8:9, Figs. 7A, 7B; '830 patent at 7:23-28, 7:42-8:19, Figs. 7A, 7B</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p>Function: receiving output signals from sensors within the [linear] vibration module during operation of the [linear] vibration module and adjusting one or more operational control outputs of the control component according to the received output signals from the sensors</p> <p>Structure: a microcontroller, a processor, a microprocessor, or a CPU contained within the vibration module that performs the algorithm shown in Figure 7A excluding steps 718-724, with reference to all steps shown in Figure 7B excluding Step 734, and all steps shown in Figure 7C, or the algorithm described in the corresponding text. <i>See, e.g.</i>, '830 patent at 6:52-7:34, 7:42-7:52, 7:60-8:40, and equivalents thereof.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
	<p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent at Abstract, 3:45-49, 5:66-8:30, 7:13-18, 7:32-8:9, 10:53-13:51, 14:60-64, 15:18-34, Figs. 6, 7A-7C, 8, 9, 19-23 and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Samsung's IPR petitions challenging the '081 and '830 patents</p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung</p>	<p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent in its entirety, including, for example: 5:45-49, 6:2-8, 6:11-12, 6:32-33, 6:43-7:24, 7:32-42, 7:50-8:30, 9:67-10:4, 10:53-11:3 11:43-58, 11:59-12:3, 12:31-35, 12:36-39, 12:48-51, 13:3-13, 13:34-41, 13:42-50, 14:60-64, Figs. 7A, 7B, 7C.</p> <p>'830 patent in its entirety, including, for example: 5:52-56, 6:9-16, 6:19-20, 6:40-41, 6:52-7:34, 7:42-52, 7:60-8:40, 10:12-16, 10:66-11:16, 11:57-12:5, 12:6-18, 12:46-50, 12:51-54, 12:63-67, 13:20-31, 13:52-59, 13:60-14:1, 15:14-17, Figs. 7A, 7B, 7C.</p> <p>October 23, 2017 Response to Office Action (App. No. 15/181,249).</p> <p><u>Extrinsic Evidence</u></p> <p>Opening Claim Construction Brief by Apple, Inc (Dkt. 75) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 5-22.</p> <p>Responsive Claim Construction Brief by Resonant Systems, Inc. (Dkt. 79) Resonant</p>

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		<p>Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 2-19.</p> <p>Affidavit in Support of Corrected Declaration of Kristopher R. Davis In Support of Plaintiff's Claim Construction Brief by Resonant Systems, Inc. (Dkt. 80) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077</p> <p>Reply Claim Construction Brief by Apple, Inc. (Dkt. 82) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 1-9.</p> <p>Sur Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 83) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 1-8.</p> <p>Claim Construction Order (Dkt. 91, 103) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 15-39.</p> <p>Opening Claim Construction Brief by Resonant Systems, Inc. (Dkt. 62) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 6-8.</p> <p>Responsive Claim Construction Brief by Sony Group Corporation, Sony Interactive</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Entertainment, Inc (Dkt. 65) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 7-14.</p> <p>Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 67) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 4-6.</p> <p>Claim Construction Order (Dkt. 107) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 9-16.</p> <p>Petition for <i>Inter Partes</i> Review (Paper 1) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 7-8, 18-23, 24-27, 45-51.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 16) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 25-27, 50-56, 58-60.</p> <p>Patent Owner's Response (Paper 26) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 9-16, 16-17, 30-31.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Petitioner's Reply (Paper 37) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 5-6, 24-26.</p> <p>Patent Owner's Sur-Reply (Paper 40) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 3-5, 6.</p> <p>Record of Oral Hearing (Paper 46) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992</p> <p>Final Written Decision (Paper 47) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 20-21, 26-39, 39-41, 81-92.</p> <p>Petition for <i>Inter Partes</i> Review (Paper 3) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 7-8, 18-23, 24-27, 45-51.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 17) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 14-15.</p> <p>Patent Owner's Response (Paper 28) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>,</p>

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		<p>PTAB IPR2023-00993 at, <i>e.g.</i>, 9-16, 16-17, 30-31.</p> <p>Petitioner's Reply (Paper 38) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, <i>e.g.</i>, 5-7, 24-26.</p> <p>Patent Owner's Sur-Reply (Paper 41) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, <i>e.g.</i>, 3-5, 6.</p> <p>Record of Oral Hearing (Paper 47) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, IPR2023-00993</p> <p>Final Written Decision (Paper 48) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 10-14, 14-16, 34-39.</p> <p>Expert testimony of Dr. Clifton Forlines supporting Samsung's proposed construction, previously served upon RevelHMI (Dkt. 69-5)</p>
<p>"wherein the control component adjusts the one or more operational control outputs of the control component according to the received output signals from the sensors in order that</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p>Function: adjusting the one or more operational control outputs of the control component according to the received output signals from the sensors in order that subsequent operation of the [linear] vibration module produces desired</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p>Function: adjusting the one or more operational control outputs of the control component according to the received output signals from the sensors in order that subsequent operation of the [linear] vibration module produces desired</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
<p>subsequent operation of the [linear] vibration module produces desired outputs from the one or more sensors corresponding to one or more operational control parameters”</p> <p>(’081 and ’830 Patents, claim 4)</p>	<p>outputs from the one or more sensors corresponding to one or more operational control parameters</p> <p><u>Corresponding structures:</u> microprocessor or microcontroller 602; processor or CPU (<i>see, e.g.</i>, Fig. 7A steps 706, 708 and/or Fig. 7B steps 730, 736-754 and/or Fig. 7C Step 762); and equivalents thereof.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’081 patent at Abstract, 3:45-49, 5:66-8:30, 7:13-18, 7:32-8:9, 10:53-13:51, 14:60-64, 15:18-34, Figs. 6, 7A-7C, 8, 9, 19-23 and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Samsung’s IPR petitions challenging the ’081 and ’830 patents</p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI’s proposed construction, served upon Samsung</p>	<p>outputs from the one or more sensors corresponding to one or more operational control parameters</p> <p><u>Structure:</u> a microcontroller, a processor, a microprocessor, or a CPU contained within the vibration module that performs the algorithm shown in Figure 7A excluding steps 718-724, with reference to all steps shown in Figure 7B excluding Step 734, and all steps shown in Figure 7C, or the algorithm described in the corresponding text. <i>See, e.g.</i>, ’830 patent at 6:52-7:34, 7:42-7:52, 7:60-8:40, and equivalents thereof.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’081 patent in its entirety, including, for example: 5:45-49, 6:2-8, 6:11-12, 6:32-33, 6:43-7:24, 7:32-42, 7:50-8:30, 9:67-10:4, 10:53-11:3, 11:43-58, 11:59-12:3, 12:31-35, 12:36-39, 12:48-51, 13:3-13, 13:34-41, 13:42-50, 14:60-64, Figs. 7A, 7B, 7C.</p> <p>’830 patent in its entirety, including, for example: 5:52-56, 6:9-16, 6:19-20, 6:40-41, 6:52-7:34, 7:42-52, 7:60-8:40, 10:12-16, 10:66-11:16, 11:57-12:5, 12:6-18, 12:46-50, 12:51-54, 12:63-67,</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>13:20-31, 13:52-59, 13:60-14:1, 15:14-17, Figs. 7A, 7B, 7C.</p> <p>October 23, 2017 Response to Office Action (App. No. 15/181,249).</p> <p><u>Extrinsic Evidence</u></p> <p>Opening Claim Construction Brief by Apple, Inc (Dkt. 75) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 5-22.</p> <p>Responsive Claim Construction Brief by Resonant Systems, Inc. (Dkt. 79) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 2-19.</p> <p>Affidavit in Support of Corrected Declaration of Kristopher R. Davis In Support of Plaintiff's Claim Construction Brief by Resonant Systems, Inc. (Dkt. 80) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077</p> <p>Reply Claim Construction Brief by Apple, Inc. (Dkt. 82) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 1-9.</p> <p>Sur Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 83) Resonant Systems, Inc.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 1-8.</p> <p>Claim Construction Order (Dkt. 91, 103) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 15-39.</p> <p>Opening Claim Construction Brief by Resonant Systems, Inc. (Dkt. 62) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 6-8.</p> <p>Responsive Claim Construction Brief by Sony Group Corporation, Sony Interactive Entertainment, Inc (Dkt. 65) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 7-14.</p> <p>Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 67) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 4-6.</p> <p>Claim Construction Order (Dkt. 107) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 9-16.</p> <p>Petition for <i>Inter Partes</i> Review (Paper 1) <i>Samsung Electronics Co., Ltd. v. Resonant</i></p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p><i>Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 7-8, 18-23, 24-27, 45-53.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 16) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 25-27, 50-56, 58-60.</p> <p>Patent Owner's Response (Paper 26) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 9-17, 30-31.</p> <p>Petitioner's Reply (Paper 37) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 5-6, 24-26.</p> <p>Patent Owner's Sur-Reply (Paper 40) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 3-5, 6.</p> <p>Record of Oral Hearing (Paper 46) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992</p> <p>Final Written Decision (Paper 47) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 20-21, 26-39, 39-43, 81-92.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Petition for <i>Inter Partes</i> Review (Paper 3) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 7-8, 18-23, 24-27, 45-53.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 17) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 14-15.</p> <p>Patent Owner's Response (Paper 28) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 9-17, 30-31.</p> <p>Petitioner's Reply (Paper 38) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 5-7, 24-26.</p> <p>Patent Owner's Sur-Reply (Paper 41) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 3-5, 6.</p> <p>Record of Oral Hearing (Paper 47) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, IPR2023-00993</p> <p>Final Written Decision (Paper 48) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 10-16, 34-39.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		Expert testimony of Dr. Clifton Forlines supporting Samsung's proposed construction, previously served upon RevelHMI (Dkt. 69-5)
<p>“wherein the one or more operational control parameters is a strength of vibration produced by the [linear] oscillation of the moveable component; and wherein the one or more operational control outputs is a frequency at which the control component drives the moveable component to [linearly] oscillate, the control component dynamically adjusting the power supplied to the driving component to produce [linear] oscillation of the movable component at a resonant frequency for the linear vibration module”</p> <p>(’081 and ’830 Patents, claim 5)</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p>Function: dynamically adjusting the power supplied to the driving component to produce [linear] oscillation of the movable component at a resonant frequency for the [linear] vibration module</p> <p>Corresponding structures: microcontroller; processor; CPU; microprocessor; and equivalents thereof</p> <p>[if an algorithm is required] Where the corresponding structure is a processor, CPU, or microprocessor, the processor/CPU/microprocessor is programmed with an algorithm comprising the following steps: (a) if the frequency at which the device operates has been increasing and the vibrational force is greater than the previously sensed vibrational force, then increase the frequency—otherwise if the vibrational force is less than the previously sense vibrational force, then decrease the frequency; and (b) if the frequency at which the device operates has not been increasing and the vibrational force is greater than the previously sensed vibrational force,</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p>Function: adjusting the one or more operational control outputs of the control component according to the received output signals from the sensors in order that subsequent operation of the linear vibration module produces desired outputs from the one or more sensors corresponding to one or more operational control parameters</p> <p>Structure: a microcontroller, a processor, a microprocessor, or a CPU contained within the vibration module that performs the algorithm shown in Figure 7A excluding steps 718-724, with reference to all steps shown in Figure 7B excluding Step 734, and all steps shown in Figure 7C, or the algorithm described in the corresponding text. See, e.g., ’830 patent at 6:52-7:34, 7:42-7:52, 7:60-8:40, and equivalents thereof.</p> <p><i>Supporting Evidence:</i></p> <p>Intrinsic Evidence</p> <p>’081 patent in its entirety, including, for example: 5:45-49, 6:2-8, 6:11-12, 6:32-33, 6:43-7:24, 7:32-</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
	<p>then decrease the frequency—otherwise if the vibrational force is less than the previously sensed vibrational force, then increase the frequency</p> <p><i>See, e.g.</i>, '081 patent at 7:38-42, 7:50-8:9, Fig. 7B; '830 patent at 7:48-52, 7:60-8:19, Fig. 7B</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent at Abstract, 3:45-49, 5:66-8:30, 7:38-42, 7:50-8:9, 10:53-13:51, 14:60-64, 15:18-34, Figs. 6, 7A-7C, 8, 9, 19-23 and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung</p>	<p>42, 7:50-8:30, 9:67-10:4, 10:53-11:3, 11:43-58, 11:59-12:3, 12:31-35, 12:36-39, 12:43-51, 13:3-13, 13:34-41, 13:42-50, 14:60-64, Figs. 7A, 7B, 7C.</p> <p>'830 patent in its entirety, including, for example: 5:52-56, 6:9-16, 6:19-20, 6:40-41, 6:52-7:34, 7:42-52, 7:60-8:40, 10:12-16, 10:66-11:16, 11:57-12:5, 12:6-18, 12:46-50, 12:51-54, 12:63-67, 13:20-31, 13:52-59, 13:60-14:1, 15:14-17, Figs. 7A, 7B, 7C.</p> <p>October 23, 2017 Response to Office Action (App. No. 15/181,249).</p> <p><u>Extrinsic Evidence</u></p> <p>Opening Claim Construction Brief by Apple, Inc (Dkt. 75) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 5-22.</p> <p>Responsive Claim Construction Brief by Resonant Systems, Inc. (Dkt. 79) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 2-19.</p> <p>Affidavit in Support of Corrected Declaration of Kristopher R. Davis In Support of Plaintiff's Claim Construction Brief by Resonant Systems, Inc. (Dkt. 80) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Reply Claim Construction Brief by Apple, Inc. (Dkt. 82) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 1-9.</p> <p>Sur Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 83) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 1-8.</p> <p>Claim Construction Order (Dkt. 91, 103) Resonant Systems, Inc. d/b/a RevelHMI v. Apple, Inc. WDTX-7-23-cv-00077 at, <i>e.g.</i>, pp. 15-39.</p> <p>Opening Claim Construction Brief by Resonant Systems, Inc. (Dkt. 62) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 6-8.</p> <p>Responsive Claim Construction Brief by Sony Group Corporation, Sony Interactive Entertainment, Inc (Dkt. 65) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 7-14.</p> <p>Reply Claim Construction Brief by Resonant Systems, Inc. (Dkt. 67) Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 4-6.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Claim Construction Order (Dkt. 107) <i>Resonant Systems, Inc. v. Sony Group Corporation (Japan) et al</i> EDTX-2-22-cv-00424 at, <i>e.g.</i>, pp. 9-16.</p> <p>Petition for <i>Inter Partes</i> Review (Paper 1) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 7-8, 18-23, 24-27, 45-51, 51-53, 53-55.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 16) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 25-27, 50-56, 58-60.</p> <p>Patent Owner's Response (Paper 26) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 9-17, 30-31.</p> <p>Petitioner's Reply (Paper 37) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 5-6, 24-26.</p> <p>Patent Owner's Sur-Reply (Paper 40) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, <i>e.g.</i>, 3-5, 6.</p> <p>Record of Oral Hearing (Paper 46) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Final Written Decision (Paper 47) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 20-21, 26-39, 39-41, 41-43, 81-92.</p> <p>Petition for <i>Inter Partes</i> Review (Paper 3) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 7-8, 18-23, 24-27, 45-55.</p> <p>Decision Granting Institution of <i>Inter Partes</i> Review (Paper 17) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 14-15.</p> <p>Patent Owner's Response (Paper 28) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 9-17, 30-31.</p> <p>Petitioner's Reply (Paper 38) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 5-7, 24-26.</p> <p>Patent Owner's Sur-Reply (Paper 41) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00993 at, e.g., 3-5, 6.</p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
		<p>Record of Oral Hearing (Paper 47) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, IPR2023-00993</p> <p>Final Written Decision (Paper 48) <i>Samsung Electronics Co., Ltd. v. Resonant Systems, Inc.</i>, PTAB IPR2023-00992 at, e.g., 10-16, 34-39.</p> <p>Expert testimony of Dr. Clifton Forlines supporting Samsung's proposed construction, previously served upon RevelHMI (Dkt. 69-5)</p>
<p>"wherein the one or more operational control parameters include both a strength of vibration produced by the linear oscillation of the moveable component and a current operational mode; and wherein the one or more operational control outputs is a control output that determines a current supplied by the power supply to the driving component and a frequency at which the control component drives the moveable component to [linearly] oscillate"</p>	<p>Plain and ordinary meaning; not subject to 35 U.S.C. § 112 ¶ 6; not indefinite.</p> <p>If subject to 35 U.S.C. § 112 ¶ 6 and Samsung's function is accepted, then:</p> <p><u>Corresponding structures:</u> microcontroller; processor; CPU; microprocessor; and equivalents thereof</p> <p>[if an algorithm is required] Where the corresponding structure is a processor, CPU, or microprocessor, the processor/CPU/microprocessor is programmed with an algorithm comprising the following steps: (a) set the mode and strength to [default values or] values representing selections made by user input to the user input features; and (b) provide a corresponding output to the power</p>	<p>Subject to 35 U.S.C. § 112 ¶ 6.</p> <p><u>Function:</u> Claim 4 function wherein the one or more operational control parameters include both a strength of vibration produced by the [linear] oscillation of the moveable component and a current operational mode; and wherein the one or more operational control outputs is a control output that determines a current supplied by the power supply to the driving component and a frequency at which the control component drives the moveable component to [linearly] oscillate.</p> <p><u>Structure:</u> Indefinite</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p>

Claim Term	RevelHMI's Proposed Construction	Samsung's Proposed Construction
('081 and '830 Patents, claim 6)	<p>supply so that the power supply provides a corresponding current to the driving component</p> <p><i>See, e.g., '081 patent at 7:10-24, 8:10-20, Figs. 7A, 7C; '830 patent at 7:20-34, 8:20-30, Figs. 7A, 7C</i></p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'081 patent at Abstract, 3:45-49, 5:66-8:30, 7:10-24, 8:10-20, 10:53-13:51, 14:60-64, 15:18-34, Figs. 6, 7A-7C, 8, 9, 19-23 and specification text corresponding to those Figures</p> <p><u>Extrinsic Evidence</u></p> <p>Samsung's IPR petitions challenging the '081 and '830 patents</p> <p>Expert testimony of Dr. Richard Hooper supporting RevelHMI's proposed construction, served upon Samsung</p>	<p>'081 patent in its entirety, including, for example: 5:45-49, 6:2-8, 6:11-12, 6:32-33, 6:43-7:24, 7:32-42, 7:50-8:30, 9:67-10:4, 10:53-11:3, 11:43-58, 11:59-12:3, 12:31-35, 12:36-39, 12:48-51, 13:3-13, 13:34-41, 13:42-50, 14:60-64, Figs. 7A, 7B, 7C.</p> <p>'830 patent in its entirety, including, for example: 5:52-56, 6:9-16, 6:19-20, 6:40-41, 6:52-7:34, 7:42-52, 7:60-8:40, 8:26-30, 10:12-16, 10:66-11:16, 11:57-12:5, 12:6-18, 12:46-50, 12:51-54, 12:63-67, 13:20-31, 13:52-59, 13:60-14:1, 15:14-17, Figs. 7A, 7B, 7C.</p> <p>October 23, 2017 Response to Office Action (App. No. 15/181,249).</p> <p><u>Extrinsic Evidence</u></p> <p>Expert testimony of Dr. Clifton Forlines supporting Samsung's proposed construction, previously served upon RevelHMI (Dkt. 69-5)</p>